

June 17, 2022

Liane M. Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Comments on the Draft 2022 Climate Change Scoping Plan Update

Dear Chair Randolph and Members of the California Air Resources Board (CARB):

On behalf of the undersigned organizations, we respectfully submit the following comments to help inform the California Air Resources Board's Draft 2022 Scoping Plan Update ("Draft Plan").

California is at a crossroads. With mounting climate impacts and increasing global temperatures, the time for climate action is *now* if the state is to avoid the worst impacts of climate change. California has a legacy of leadership in catalyzing climate action, but maintaining this status will require implementation strategies beyond what is proposed in the Draft Plan – including the role it has established for its natural and working lands (NWL) sector.

Dramatic and sustained reduction of greenhouse gas emissions is a critical element in addressing climate change. However, robust and durable climate action goes beyond carbon accounting alone. Creating a resilient future in which Californians can truly thrive requires sustained investment and action to protect the ecosystems whose services we all rely on. We believe that continued integration of the state's NWL in statewide goals to address climate change is essential in achieving carbon neutrality, and believe the Draft Plan can be even more ambitious with respect to the treatment of this sector. The substantial gap between what our organizations believe is feasible within this sector and what the Draft Plan proposes highlights the continued work needed to actualize the potential of California's NWL.

It is with this in mind that we share the following recommendations, noting that these recommendations reflect the collective interests of our groups, and individual groups may offer additional recommendations specific to their areas of expertise:

Modeling needs continued refinement and stakeholder engagement, as an ongoing action associated with this Draft update.

We respect that – for the first time – CARB engaged in extensive modeling for the NWL sector. However, substantial additional work and refinement are needed to

accurately illustrate the potential of the NWL sector, in areas that include – but are not limited to – forest conservation, wetland restoration, organic agriculture, desert lands, and urban forestry. To accomplish this task, we recommend that CARB establish a process to refine modeling scenarios with stakeholder engagement.

California cannot afford to wait another five years for this refinement. As the United Nations Intergovernmental Panel on Climate Change (IPCC) Working Group III Co-Chair Jim Skea recently stated, “it’s now or never, if we want to limit global warming to 1.5° C.”¹ To ensure that progress in the NWL sector is not stymied, we request that CARB increase the ambition of the NWL scenarios and re-evaluate its modeling in time for the final draft to better inform the final Scoping Plan. We also propose that over the next year CARB convene a scientific advisory group composed of external experts in modeling for the NWL sector, and with this group, engage in ongoing review and discussion to improve and refine the outputs described by the Draft Plan, with a report back to the Board.

California’s 30x30 goal, Extreme Heat Action Plan and NWL Climate Smart Strategy should be explicitly integrated into the Draft Plan’s Strategies for Success and, where possible, modeling for the NWL sector.

Climate action in the NWL sector not only will contribute to the goals that AB 32 lays out for the Scoping Plan, but also supports these ecosystems while helping California achieve its climate goals in other sectors. For example, land conservation and urban forestry is an important companion to reducing Vehicle Miles Traveled and community energy usage.

At the same time, while certain elements of the NWL sector make it unique from other sectors addressed by the Scoping Plan, this sector deserves parity in action. Modeling for the transportation and energy sectors is driven, at least in part, by policy. The same must be true for the NWL sector.

Increased conservation and improved management – consistent with what’s proposed in Executive Order N-82-20, including California’s new 30x30 goal, and NWL Climate Smart Land Strategy – would carry significant implications for the Draft Plan and what it lays out for the NWL sector. Although the Draft Plan includes minor mentions of these commitments, they do not appear to be meaningfully integrated into the modeling or proposed actions for the NWL sector.

We recommend that CARB work to explicitly integrate the 30x30 goal, Extreme Heat Action Plan, and NWL Climate Smart Strategy directly into the Draft Plan’s Strategies for Success and describe how these policies are or are not reflected with some level of specificity in modeling for the NWL sector.

¹ <https://www.ipcc.ch/2022/04/04/ipcc-ar6-wgiii-pressrelease/>

Although California's carbon neutrality goal is ambitious, we believe that it is *only* attainable if all sectors, including NWL, are leveraged to their full emissions reductions and carbon sequestration potential. This will not be possible without continued work to improve upon the NWL modeling in the Draft Plan, and our groups stand ready to help CARB in this endeavor. Please do not hesitate to reach out if we can provide additional information or clarification relating to this letter.

Sincerely,

Sydney Chamberlin
Project Manager, Climate & Nature-based
Solutions
The Nature Conservancy

Dan Silver
Executive Director
Endangered Habitats League

Adam Livingston
Director of Planning and Policy
Sequoia Riverlands Trust

Ellie M. Cohen
Chief Executive Officer
The Climate Center

Manny Gonez
Director of Policy Initiatives
Tree People

Paul Mason
Vice President, Policy & Incentives
Pacific Forest Trust

Rhonda Berry
President & CEO
Our City Forest

Catherine Martineau
Executive Director
Canopy

Anne Fenkner
Chair
Sacramento Urban Forest Council

Mona Cummings
Executive Director
Tree Fresno

Stuart Wood, PhD
Executive Director
Sustainable Claremont

Pamela Flick
California Program Director
Defenders of Wildlife

Elizabeth Lanham
Chair
Bay Area Urban Forest Ecosystem Council

Katherine McNenny
Project Director
Industrial District Green

Jessica Sanders
Executive Director
Sacramento Tree Foundation

Kenneth Knight
Executive Director
Your Children's Trees

Claire Robinson
Managing Director
Amigos de los Rios

Rachel Payne
Executive Director
Tree Pledge

Torri Estrada
Executive Director and Director of Policy
Carbon Cycle Institute

Andrea Williams
Director of Biodiversity Initiatives
California Native Plant Society

Grey Kolevzon
Co-Director
Growing Together

Claire Schlotterbeck
Executive Director
Hills for Everyone

Jackie Heyneman
Chair
Save Our Forest

Nancy Hughes
Executive Director
California Urban Forests Council

Markos Major
Executive Director
Climate Action Now!

Jeanne McConnell
Executive Director
Angelenos for Trees

Sara Davis
Chair
Central Coast Urban Forests Council

Nancy Sappington
Chair
Inland Urban Forest Council

Eminy Darakjy
Chair
Street Tree Seminar

Mike Palat
Chair
San Diego Regional Urban Forests
Council

Mark Kenyon
Executive Director
North East Trees

Jeanne Merrill
Policy Director
California Climate and Agriculture
Network

Kevin Gaston
Director
TreePeople Land Trust

Linda Rudolph, MD, MPH
Director
Center for Climate Change and Health

Rose Epperson, CAE
Executive Director
Western Chapter International Society of
Arboriculture

Tom Hamilton
Executive Director
Lumbercycle

Shelley Billik
Chair
LA Community Forest Advisory
Committee

Johng Ho Song
Executive Director
Koreatown Youth and Community Center

Juan Altamirano
Director of Government Affairs
Trust for Public Land

Kelaine Vargas Ravdin
Owner
Urban Ecos

Michael Wellborn
President
Friends of Harbors, Beaches and Parks

Mona Cummings
Chair
San Joaquin Urban Forest Council